

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MELINDA SGARIGLIA,)	
)	
Plaintiff,)	Case No. 1:19-cv-05684
v.)	
)	Honorable Robert W. Gettleman
AMERICAN INTERNATIONAL)	
RELOCATION SERVICES, LLC, d/b/a)	Magistrate Judge Gabriel A. Fuentes
AIRES, an Illinois limited liability)	
company, NICHOLAS GONRING, and)	
KELSEY GONRING,)	
)	
Defendants.)	

**MOTION OF NICHOLAS AND KELSEY GONRING TO RE-SET BRIEFING SCHEDULE
AS TO THE GONRINGS' REPLY IN SUPPORT OF CROSS-MOTION FOR SUMMARY
JUDGMENT ON DAMAGES**

Defendants Nicholas and Kelsey Gonring (collectively the "Gonrings"), by their attorneys, Jordan A. Finfer and Elizabeth L. Archerd of the law firm of Patzik, Frank & Samotny Ltd., respectfully request that this Court re-set the briefing schedule on the parties' cross-motions for summary judgment on damages to allow the Gonrings to file their reply in support of their cross-motion for summary judgment on damages, and state as follows:

1. On January 18, 2024, this Court entered an order setting the following briefing schedule on the parties' cross-motions for summary judgment on damages: Plaintiff's motion for summary judgment on damages due March 15, 2024; the Gonrings' response and cross-motion due May 15, 2025; Plaintiff's reply due May 29, 2024; and the Gonrings' reply due June 12, 2024. Dkt. #253.

2. On March 15, 2024; April 19, 2024; and May 17, 2024, Plaintiff filed motions for extension of time to file her motion for summary judgment on damages. Dkt. #254; Dkt. #257; Dkt. #259. These motions were granted and the briefing schedule was ultimately amended as

follows: Plaintiff's motion for summary judgment on damages due May 23, 2024; the Gonrings' response and cross motion due July 29, 2024; plaintiff's reply due August 12, 2024; and the Gonrings' reply due August 26, 2024. Dkt. #260.

3. On May 23, 2024, Plaintiff filed her motion for summary judgment on damages. Dkt. #261.

4. On July 29, 2024, the Gonrings filed their response to Plaintiff's motion for summary judgment and cross-motion for summary judgment on damages and memorandum in support. Dkt. #264; Dkt. #265.

5. On August 12, 2024, Plaintiff filed a motion for extension of time to file her response/reply. Dkt. #268.

6. Plaintiff was granted an extension until August 23, 2024, but no date was set for the Gonrings to file their reply in support of their cross-motion for summary judgment on damages. Dkt. #269.

7. On August 23, 2024, Plaintiff filed a second motion for extension of time to file her response/reply. Dkt. #270.

8. Plaintiff was granted an extension until August 27, 2024 to file her reply; however, the Order granting Plaintiff's request did not include a date by which the Gonrings' may file a reply in support of their cross-motion for summary judgment on damages. Dkt. #271.

9. Plaintiff filed her reply in support of her motion for summary judgment on damages on August 27, 2024. Dkt. #272.

10. The Gonrings respectfully request that this Court re-set the remaining briefing schedule to provide time for the Gonrings to file their reply in support of their cross-motion for

summary judgment on damages. The Gonrings ask to have 21 days, until September 18, 2024, by which to do so.

WHEREFORE, Defendants/Third-Party Plaintiffs, Nicholas and Kelsey Gonring, respectfully request that this Honorable Court enter an order: (1) granting this motion; (2) allowing the Gonrings until September 18, 2024 to file a reply in support of their Cross-Motion for Summary Judgment on Damages; and (3) for such other and further relief as this Court deems equitable and just.

Dated: August 28, 2024

Respectfully submitted,

**NICHOLAS GONRING and KELSEY
GONRING**

By: /s/ Elizabeth L. Archerd
One of their attorneys

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CERTIFICATE OF SERVICE

The undersigned, a non-attorney, under penalty of perjury, hereby certifies that the MOTION OF NICHOLAS AND KELSEY GONRING TO RE-SET BRIEFING SCHEDULE AS TO THE GONRINGS' REPLY IN SUPPORT OF CROSS-MOTION FOR SUMMARY JUDGMENT ON DAMAGES was electronically filed on August 28, 2024 using the court's CM/ECF system and will then send same to all ECF-registered counsel of record.

/s/ Melissa Siedlecki